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To: [Eric Blischke/R10/USEPA/US@EPA](#)
Subject: Round 2 Report Issues
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I am not sure if these are issues you would want to bring up today, but here is a general list. I will be providing a more comprehensive one later this week.

-Scale: The scale of the risk assessment and analysis in the round 2 report is exclusively site-wide (sediment, benthic tissue, fish tissue, water, etc.) with the exception of the selection of the FPM to represent benthic toxicity. The site-wide scale is primarily used to determine initial COPCs (iCOPCs) in this report. This issue is perhaps the most concerning for me because it shows we are on totally different pages about the scale of protection which I believe feeds into assessment and measurement endpoints (e.g. evaluating benthic tissue such as clams by comparing a site wide mean to a TRV isn't going to fly). Proper development of exposure point concentrations is also fairly well laid out in DEQ and EPA guidance, which was not followed here. Countless iterations of the PRE and Eco Comprehensive Report work plan had comments from the gov. team on these issues, and how they should be evaluated. In addition, we have had countless discussions on the topic which I feel should have outlined how we wanted to go forward (in addition to the tables you put together, Eric). In any case, they are making it clear that they want to define risk and make decisions for cleanup (e.g. iAOCs) based on a risk scale than we would agree with.

-Reductions in Lines of Evidence in Defining iAOPCs: I thought clear direction was given to evaluate all lines of evidence in determining iAOPCs. Since this report did not do this (esp. dropping benthic tissue evaluations such as worms and clams, TZ water LOEs, etc.), this is something we will have to re-create ourselves making the identification of data gaps harder.

-TRVs: It was my understanding that instruction was given to use the provisional TRVs in the Round 2 Report. Instead, new TRVs were used that significantly changed the results of the identification of iCOCs in given media. Most notably, the LOAEL for PCBs selected for the risk analysis in this report was 4,020 ug/kg ww (or 4.02 mg/kg ww), which is significantly higher than the LOAEL of 720 ug/kg ww based on EPA's preferred analysis as a LOAEL derived from the fifth percentile. The selection of this value for evaluating fish tissue residues is particularly disturbing given they had selected 520 ug/kg ww (or 0.52 mg/kg ww) in their TRV analysis presented in Appendix B to the Preliminary Risk Evaluation, "Toxicity Reference Value Selection". Coincidentally, the value they had originally selected (0.52 mg/kg) is also the value, according to Burt, they are using on the Duwamish for total PCBs. For Portland Harbor they also used the 4,020 ug/kg in the food web model as an acceptable conc. for back calculating to sediment.

Other examples include: Beta-HCH, the LWG selected LOAEL was 1,580 ug/kg ww, which is several orders of magnitude higher than the Dyer et al. TRV of 4.9 ug/kg ww; BEHP, the selected LOAEL is two orders of magnitude higher than the

provisional TRVs.

These are the big ones for me, and have the biggest ramifications for changes in conclusions in this report.

-Jennifer